

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 24-20466-CR-BECERRA**

**UNITED STATES OF AMERICA**

v.

**TIRON ALEXANDER,**

**Defendant.**

/

**GOVERNMENT'S PROPOSED VOIR DIRE QUESTIONS**

Pursuant to Rule 24(a) of the Federal Rules of Criminal Procedure and the Court's pre-trial scheduling order, the United States of America, through the undersigned Assistant United States Attorney, requests that the Court include in its voir dire the following questions:

1. This case involves the alleged defrauding of airlines, and you will hear from witnesses who may include representatives of Spirit Airlines, Frontier Airlines, American Airlines, Alaska Airlines, ExpressJet Airlines, Delta Air Lines, Allegiant Airlines, and Avelo Airlines. Has anyone here had a negative experience with any of these airlines?
2. This case concerns false statements the Defendant is alleged to have made on an internet application form to secure free airplane tickets. Does anyone believe that people making false statements on online forms is not a big deal, or at least should not be punished criminally?
3. When a car door is left unlocked, that circumstance makes it easier for thieves to break in and steal the victim's belongings. Does anyone here believe that a victim failing to take precautions to protect against theft affects whether a thief has done something wrong?
4. This case involves the Defendant allegedly securing free airfare through false pretenses, with the financial loss each time being the cost of an airplane ticket. Does anyone here believe that the theft of airfare through false pretenses should not be a felony offense?

5. This case concerns events that began in 2018 and that were charged by indictment last year. Does anyone here believe that the amount of time that passes between events happening and then later being charged as a crime has any bearing on the merits of the case?

6. The Government is not required to prove its case with any particular type of evidence, such as video or fingerprints. For example, to prove that a person took an airplane flight, the Government does not necessarily need to provide video or photographic evidence if it otherwise satisfies you that the person took the flight beyond a reasonable doubt. Does anyone disagree, or otherwise think that the Government should need to provide any particular kind of evidence to prove its case?

Respectfully submitted,

HAYDEN P. O'BYRNE  
UNITED STATES ATTORNEY

Date: April 24, 2025

By: /s/ Zachary A. Keller  
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on April 24, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

/s/ Zachary A. Keller  
Zachary A. Keller  
Assistant United States Attorney